

EXHIBIT 31

Exhibit 15
Past Patent Damages Before Geographic Adjustment
to Limit Patent Infringement Damages to U.S. Infringement Only
Reflects Patent Apportionment of 30%

(millions)	2007	2008	2009	2010	2011	TOTAL 2007 - 2011	
Starting Point Apportioned to Patent Contribution	\$6.0	\$6.0	\$6.5	\$3.6	\$7.5	\$29.6	[1]
Upward Adjustments Apportioned to Patent Contribution							
Harm to Sun from Diminished Control and Compatibility							
Sun's Expected Profit from Armstrong Monetization (Includes only Armstrong Business Model Projections)	\$0.0	-\$0.2	\$0.1	\$38.8	\$128.4	\$167.2	[2]
Sun's Incremental Profit from Ad Revenue Sharing Without \$25M Cap	\$0.0	\$0.0	\$0.0	\$0.0	\$8.4	\$8.4	[3]
Revenue Sharing From Other Benefits to Google	Not Quantified						[4]
Litigation Premium	Not Quantified						[5]
Harm to Sun from Java Fragmentation	Not Quantified						[6]
Past Patent Damages Apportioned for Patent Contribution	\$6.0	\$5.9	\$6.6	\$42.4	\$144.3	\$205.1	[7]

Notes & Sources

[1] Exhibit 14

[2] Armstrong business model finance presentation projected that Sun would earn revenues through the end of FY09 in connection with Project Armstrong. The timing of expected Armstrong sales is shifted to begin in late 2008 to correspond to the timing of actual Android sales. Sun Microsystems, "Project Armstrong: Business Model," February 2006, OAGOOGL100166874 - OAGOOGL100166899, at OAGOOGL100166884.

[3] Sun would have required a share of the proceeds from Google's replacement business model to compensate for risk to existing Sun business model due to incompatible license. In the event that the platform is a commercial success, Sun shares in that success. Calculated using actual Android ad revenue for years 2008 - 2010 and estimate for 2011 taken from Google OC Quarterly Reviews. GOOGLE-00303725; GOOGLE-01-00053552; GOOGLE-77-00053555.

[4] Includes direct benefits such as net revenues from the Android Market and DTC handset sales. Also includes indirect benefits such as greater access to end users and the facilitation of other products sales (music, videos, books).

[5] The Litigation Premium is meant to reflect the fact that the starting point terms were negotiated before the patents at issue were found to be valid. Thus, the starting point reflects an uncertainty discount that is left unquantified here.

[6] Harm to Sun from Java Fragmentation is left unquantified.

[7] = [1] + [2] + [3]